# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



A1903026

Application of the Protect Our Communities Foundation for Rehearing of Resolution E-4981

NOTICE OF AVAILABILITY OF SUPPORTING DOCUMENTS FOR THE APPLICATION OF THE PROTECT OUR COMMUNITIES FOUNDATION FOR REHEARING OF RESOLUTION E-4981 AND CERTIFICATE OF SERVICE

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Dated: April 2, 2019

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### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of the Protect Our Communities Foundation for Rehearing of Resolution E-4981	A	
resolution E 1901		

# NOTICE OF AVAILABILITY OF SUPPORTING DOCUMENTS FOR THE APPLICATION OF THE PROTECT OUR COMMUNITIES FOUNDATION FOR REHEARING OF RESOLUTION E-4981

Pursuant to Rule 1.9 of the California Public Utilities Commission Rules of Practice and Procedure, Protect Our Communities ("POC") hereby provides notice that the supporting documents to THE APPLICATION OF THE PROTECT OUR COMMUNITIES

FOUNDATION FOR REHEARING OF RESOLUTION E-4981 were filed on April 2, 2019 and may be viewed and downloaded at:

POC published the URL providing these documents on or before March 27, 2019.

https://www.dropbox.com/sh/utsto3jdiempk41/AACa1 aiUkZ829ygr5xTE9qAa?dl=0.

Copies of the posted documents are available in other formats upon request from:

Yochanan Zakai SHUTE, MIHALY & WEINBERGER LLP 396 Hayes Street San Francisco, CA 94102 Telephone: (415) 552-7272 Facsimile: (415) 552-5816

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The posted documents are voluminous, and an index describing the document's titles and contests is attached hereto.

Respectfully submitted,

/s/ Jamie Pang

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## Index to Evidence and Documents Relied Upon by Protect Our Communities Foundation

Date	Filing Party	Document
		A17-06-006
6/01/2017	A17-06-006 San Diego Gas & Electric Company	Testimony of Daniel Sullivan on Behalf of San Diego Gas & Electric Company
	A17-10-007/008 S	DG&E 2019 General Rate Case
4/2001	California Energy Commission	Commission Decision: Application for Certification – Otay Mesa Generating Project (PG&E National Energy Group) (originally filed in Docket No. 99-AFC-5)
5/01/2007		Amended and Restated Power Purchase Agreement Between SDG&E and OMEC
5/01/2007		2007 Ground Sublease and Easement agreement Between Calpine Corporation and OMEC
5/14/2018	The Utility Reform Network	Prepared Testimony of Kevin Woodruff Addressing the Proposals of San Diego Gas & Electric Company and Southern California Gas Company in Their Test Year 2019 General rate Case Related to Otay Mesa Energy Center
6/18/2018	Protect Our Communities Foundation	Rebuttal Testimony of Bill Powers, P.E. on Behalf of Protect Our Communities Foundation
7/16/2018		Reporter's Transcript: Evidentiary Hearings
10/12/2018	Protect Our Communities Foundation	Reply Brief of the Protect Our Communities Foundation
		A06-08-010
12/24/2008		Decision 08-12-058: Granting a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project
		CAISO
6/23/2011		CAISO Planning Standards
12/14/2012		16 FERC ¶ 61,209: FERC Order Approving Stipulation and Consent Agreement with CAISO (FERC Dkt IN13-4-000)
11/02/2017		CAISO Transmission Planning Standards
3/22/2018		Transmission Plan
5/01/2018		2019 & 2023 Final Local Capacity Requirements

Date	Filing Party	Document
		Study Results: Summary of Findings
5/15/2018		2023 Long Term Local Capacity Technical
		Analysis
2/04/2019		Draft 2018-2019 ISO Transmission Plan: Appendix
2/10/2010		A
3/19/2019		CAISO Curtailed and Non-Operational Generators
(accessed)		in California (Aug and Sept 2011)  PUC No Docket
8/2018		CPUC Energy Division: The 2017 Resource
0/2010		Adequacy Report
		CPUC General Order 96-B
		Miscellaneous
4/2012		Arizona-Southern California Outages on September 8, 2011 – Causes and Recommendations (FERC & North American Electric Reliability Corp.)
6/18/2012		Webpage: Sempra.com "SDG&E Energizes Sunrise Powerlink: 117-Mile, 500,000-Volt Transmission Line Will Support Electric System Reliability This Summer"
12/2015		City of San Diego Climate Action Plan
10/2018		Business Plan for the Formation of a Community Choice Aggregation Program for the City of San Diego
10/25/2018		Webpage: GreenTech Media "San Diego Moves Ahead With 100% Clean Energy Community Choice Program"
11/30/2018		California Distributed Generation Statistics, https://www.californiadgstats.ca.gov/ [NEM_CurrentlyInterconnectedDataset as of November 30, 2018].
2/22/2019		Webpage: San Diego Union Tribune "Utilities commission OKs agreement between SDG&E and Otay Mesa natural gas plant; critics say it's not needed"
2/25/2019		Webpage: Times of San Diego "San Diego City Council Votes 7-2 to Establish Public-Sector Energy Provider"
3/19/2019	San Diego Gas and	Web Page: San Diego Gas & Electric
(accessed)	Electric Co.	"AC Saver (Summer Saver)"
3/26/2019	San Diego Gas and	Web Page: Sustainable Communities Project

Date	Filing Party	Document
(accessed)	Electric Co.	
		R01-10-024
6/15/2004		Decision 04-06-011: Approving Motion of San Diego Gas & Electric Company (U 902 E) for Approval to Enter into New Electric Resource Contracts Resulting from SDG&E's Grid Reliability Request for Proposal and Dissenting Opinion of Commissioners Loretta M. Lynch and Carl Wood
7/05/2005		Decision 05-06-062: Order Granting Limited Rehearing of Decision (D.) 04-06 Regarding the Otay Mesa Power Purchase agreement, and Denying Rehearing in All Other Respects
9/09/2005		Decision 05-09-005: Decision Denying Petition for the Office of Ratepayer Advocates for Modification of Decision 04-06-011
2/17/2006		Decision 06-02-031: Opinion on Rehearing on San Diego Gas & Electric Company's Application for Approval for the Otay Mesa Generating Plant
7/03/2006		Joint Petition of San Diego Gas & Electric Company (U 902_E), the Division of Ratepayer Advocated, the Utility Reform Network, and the Utility Consumer Action Network for Modification of Decision 04-06-011 and Decision 06-02-031
9/08/2006		Decision 06-09-021: Opinion Approving Revised Power Purchase Agreement for Otay Mesa Generating Plant and Modifying Decision 06-02- 031
12/04/2006		Decision 06-12-001: Order Dismissing Application for Rehearing of Decision (D.) 06-02-031
11/16/2011	Petition of San Diego Gas & Electric Company	Petition of San Diego Gas & Electric Company (U 902-D) for Modification of D.04-06-011 (as Modified by D.06-02-031 and D.06-09-021) Regarding Otay Mesa Energy Center
11/13/2018	Protect Our Communities Foundation	The Protect Our Communities Foundation Petition for Modification of Decision D.06-09-021
11/13/2018	Protect Our Communities Foundation	Attachment 2: POC Proposed Modifications of D.06-09-021 Pursuant to Rule 16.4 (b): Opinion Approving Revised Power Purchase Agreement for Otay Mesa Generating Plan and Modifying Decision 06-02-031

Date	Filing Party	Document
11/13/2018	Protect Our Communities Foundation	Attachment 3: 10/26/2018 Advice Letter 32-94E: Request for Approval of the Resource Adequacy Confirmation Between San Diego Gas & Electric Company and Otay Mesa Energy Center, LLC for the Otay Mesa Energy Center Power Plant
12/13/2018	Calpine Corporation and Otay Mesa Energy Center	Response of Calpine Corporation and Otay Mesa Energy Center, LLC to the Protect Our Communities Foundation Petition for Modification of Decision D.06-09-021
12/13/2018	San Diego Gas & Electric Company	Response San Diego Gas & Electric Company (U 902-E) to the Protect Our Communities Foundation Petition for Modification of Decision D.06-09-021
2/15/2019		Proposed Decision of ALJ Fitch: Decision Denying Protect Our Communities Foundation Petition for Modification of Decision D.06-09-021, Concerning Otay Mesa Energy Center
3/07/2019	Protect Our Communities Foundation	The Protect Our Communities Foundation Comments on Proposed Decision Denying Petition for Modification of Decision D.06-09-021
		R04-04-003
7/14/2004		Decision 04-07-028: Interim Opinion Regarding Electrify Reliability Issues
		R07-05-025
11/24/2008		Decision 08-11-056: Authorizing Measures to Facilitate Removal of Department of Water Resources from the Role of Supplying Electric Power
		R12-03-014
3/04/2014		Decision 14-02-040: Modifying Long-Term Procurement Planning Rules
3/14/2014		Decision 14-03-004: Authorizing Long-Term Procurement for Local Capacity Requirements Due to Permanent Retirement of the San Onofre Nuclear Generations Station
		R13-09-011
3/05/2018		Decision 18-03-012: Order Denying Rehearing of Decision (D.) 15-11-042
		R14-07-002
9/22/2016		Decision 16-09-036: Order Modifying Decision (D.) 16-01-044 and Denying Rehearing, as Modified

Date	Filing Party	Document
	R16-	-02-007 LTPP-IRP
2/19/2016		Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long- Term Procurement Planning Requirements
2/13/2018		Decision 18-02-018: Setting Requirements for Load Servicing Entities Filing Integrated Resource Plans
8/01/2018	San Diego Gas and Electric Co.	2018 Individual Integrated Resource Plan of San Diego Gas & Electric Company (U 902 E)
9/12/2018	Protect Our Communities Foundation	The Protect Our Communities Foundation Comments on Utilities' Proposed Integrated Resource Plans (IRP)
1/04/2019	San Diego Gas & Electric Company	Comment of San Diego Gas & Electric Company (U 902 E) in Response to Rule Seeking Comments of Inputs and Assumptions for Development of the 2019-2020 Reference System Plan
		R17-06-026
4/02/2018	Protect Our Communities Foundation	Testimony of Bill Powers
10/19/2018		Decision 18-10-019: Modifying the Power Charge Indifference Adjustment Methodology
10/22/2018		SDGE PCIA Common Workpaper Model_2019 ERRA Forecast - Illustrative FINA
	SDG	&E Advice Letters
11/06/2015	San Diego Gas and Electric Co.	Advice Letter 2815-E: Request for Approval of the Resource Adequacy Contract Between SDG&E and NRG Power Marketing LLC for the Encina Power Station
6/06/2016	San Diego Gas and Electric Co.	Advice Letter 2902-E: Request for Approval of the Resource Adequacy Contract Between SDG&E and NRG Power Marketing LLC for the Encina Power Station
6/30/2017	San Diego Gas and Electric Co.	Advice Letter 3088-E and 3088-E-A: Request for Approval of the Resource Adequacy Contract between SDG&E and Sempra Gas & Power Marketing, LLC for the Termoelectrica De Mexicali Power Plant; and Supplement Filing
3/06/2018		Resolution E-4901: By Advice Letter 3101-E, Filed

Date	Filing Party	Document
		on July 28, 2017
7/05/2018	San Diego Gas and Electric Co.	Advice Letter 3246-E: Approval of Amendments to Power Purchase Tolling Agreements with Existing CHP Facilities
7/20/2018	San Diego Gas and Electric Co.	Advice Letter 3249-E: Request for Approval of the Resource Adequacy Contract Between SDG&E and Sempra Gas & Power Marketing, LLC for the Termoelectrica de Mexicali Power Plant
9/06/2018	San Diego Gas and Electric Co.	Advice Letter 3270-E/3270-E-A: Request for Approval of the Resource Adequacy Contract between SDG&E and CALPEAK Power LLC for the CALPEAK Border Unit 1 and Enterprise Unit 1 Power Plants
9/28/2018	San Diego Gas and Electric Co.	Advice Letter 3270-E/3270-E-A: Request for Approval of the Resource Adequacy Contract between SDG&E and CALPEAK Power LLC for the CALPEAK Border Unit 1 and Enterprise Unit 1 Power Plants

### BEFORE THE PUBLIC UTILITIES COMMISSION

#### OF THE STATE OF CALIFORNIA

Application of the Protect Our Communities Foundation for Rehearing of Resolution E-4981

A.			

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have filed and served a copy of PROTECT OUR COMMUNITIES FOUNDATION'S APPLICATION FOR REHEARING OF RESOLUTION E-4981 and NOTICE OF AVAILABILITY OF SUPPORTING DOCUMENTS FOR THE APPLICATION OF THE PROTECT OUR COMMUNITIES FOUNDATION FOR REHEARING OF RESOLUTION E-4981 pursuant to Rules 1.9 and 1.10.

The Application for Rehearing and Notice of Availability of Documents has been served to the designated persons to Advice Letter 3294-E's service list as follows:

Edward Randolph
Director of Energy Division
(Edward.Randolph@cpuc.ca.gov)

Michele Kito Supervisor – Energy Division (MK1@cpuc.ca.gov)

Julie Halligan
Public Advocates Office
(Julie.Halligan@cpuc.ca.gov)

Energy Division Tariff Unit (EdTariffUnit@cpuc.ca.gov)

Robert Finkelstein The Utility Reform Network (BFinkelstein@turn.org)

Gregory Wade Solana Energy Alliance (Chad@tosdallaw.com)

Clay Faber
Director — Federal and California Regulatory
San Diego Gas & Electric
(SDG&ETariffs@semprautilities.com)

The Application for Rehearing and this Notice of Availability of Documents has also been served by e-mail to:

Helen Yee, Esq.	Helen.Yee@cpuc.ca.gov
Dale A. Holzschuh, Esq.	Dale.Holzschuh@cpuc.ca.gov
Pamela Nataloni, Esq.	Pamela.Nataloni@cpuc.ca.gov
Monica McCrary, Esq.	Monica.McCrary@cpuc.ca.gov
Margarita Lezcano	Margarita.Lezcano@cpuc.ca.gov

A courtesy copy of these documents are also being served on OMEC related proceeding Service Lists A. 17-10-007/008 and R. 17-09-020 and R. 01-10-024.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on April 5, 2019.

s/ Sara L. Breckenridge
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